

## **INTERROGATORIES**

**PETITION NO. 1120** – The United Illuminating Company petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed modifications to the Hawthorne Substation located at 180 Hawthorne Drive, Fairfield, Connecticut.

- 1) Regarding the six 70 foot high lightning mast protection, planned for the South/west side, please provide an accurate location of the lightning masts on UI's Photo and please provide the distance to the closest abutters property line. Indicate which address that would be.  
Please provide the study that indicates that six masts are needed and the need for the proposed height.
- 2) Regarding the 70 foot high Lightning Mast protection, planned for the east side, please provide an accurate location of the lightning masts on UI's Photo and Please provide the distance to the closest abutter property line. Indicate which address that would be.  
Please provide the study that indicates that this mast needs to be added on the existing substation and at the proposed height.
- 3) Please provide how many times that this substation has been hit by lightning and the number of blackouts in the past 7 years at this substation.
- 4) Are there other options for protecting the Substation from lightning?
- 5) Please indicate in detail the positioning of the lights and show on UI's Photo. Also how many light masts will be installed and how tall are the lighting masts? How high will the lights be positioned on the mast?
- 6) What hours will the lights be on?  
Will any of the illumination from the lighting be intrusive onto any of the abutting property? If so what is that address(s)?
- 7) Please provide lighting and illumination study. Please include study with all lights on at full running capacity.
- 8) Regarding the additional high wattage yard lighting, please provide the manufacturer's spec sheet. Please include actual manufacturer's detailed photos of the lighting to be used?
- 9) In order to reduce lighting can infrared cameras be used to reduce lighting without impacting security?
- 10) Can motion detectors be used to turn on the lights only if there is a security breach?

- 11) Regarding the proposed fencing, please provide the exact location and placement of the fencing on UI's Photo with each abutter's property line. Please show addresses. Please provide the distance from each abutter's property line.
- 12) Besides the proposed fencing, is there any other construction material that can be used to safely secure the parameter of the substation?
- 13) Will any part of the existing or proposed fencing be located on any property other than UI's property?
- 14) Regarding the tree and shrubbery clearing amid Schiller Road and General Electric (3135 Easton Turnpike); what is the exact amount of trees and shrubbery being removed? Please indicate the location of the trees being removed on UI's Photo.
- 15) Regarding the tree and shrubbery clearing amid Hawthorne Drive and General Electric; what is the exact amount of trees and shrubbery being removed? Please indicate the location of the trees being removed on UI's Photo.
- 16) Regarding the large equipment access road, will the existing driveway need to be widened for the large mobile transformer and 24 foot double swing drive gate? If so, how much wider will the existing driveway be widened? Please provide details of additions on UI's Photo with each property line shown.
- 17) Regarding the 90 foot mobile transformer mentioned; in the past seven years, how many times has the mobile transformer been used at this location?
- 18) The petition mentioned that the excavated soil will stay on property. Can you explain why and indicate on UI Photo where it will be stored?
- 19) Did UI do a study on how long-term exposure to continual nighttime light can affect health on humans?
- 20) Regarding the proposed standard video cameras, where will the cameras be located? Please show on UI Photo.
- 21) Will any of the new and existing cameras protrude on any of the abutters' property? If yes please provide address(s).
- 22) Regarding the fugitive dust exposure, please provide your safety plan for the health and protection of the surrounding neighborhood, especially the abutting neighbors with allergies, lung diseases and heart diseases.
- 23) Regarding the aluminum cutting, please provide your safety plan for the health and protection of the surrounding neighborhood, especially the abutting neighbors with allergies, lung diseases and heart diseases.

- 24) Please provide any and all documentation of the environmental testing and soil testing done within the past seven years on the existing and the new property acquired from General Electric.
- 25) Please provide your dewatering activity plan.
- 26) Is there an increased risk of fire or explosion with the addition of the new capacitors?  
If yes, what is UI's plan to secure the fire and/or explosion and provide safety of the neighbors?
- 27) Are there or will there be fire protection such as fire and smoke alarms. If so will these be monitored by the Fairfield Fire Department?
- 28) Please provide detailed plan on storm water control. How will you be moderating impact of storm water runoff?
- 29) What is UI's plan for erosion and sediment control during construction?
- 30) What are your plans on buffering the upland areas adjacent to wetlands, what maintenance and protection will UI provide?
- 31) How will the aluminum particles and fugitive dust be removed from wetlands, streams, and turtle habitat?
- 32) Does UI plan on filtering any suspended solids, nutrients, and harmful or toxic substances from the wetlands?
- 33) Regarding the forty plus trees and shrubbery being cleared on or near the wetlands, does UI plan on adding vegetated buffers to the wetland area to provide water quality protection? If so, where, how large will the buffers be, and how much buffer will be adding? Please provide detailed map with vegetated buffering shown.
- 34) Please explain why, only until recently, existing vegetation between UI and abutters land is dying away, i.e.: Forsythia, White pines, generic shrubbery, etc.
- 35) Please provide sound assessment study and any other studies regarding possible noise nuisance. Were the Assessment Studies conducted during various time periods, temperatures, humidities, wind speeds and sky covers? Please provide your most current sound study.
- 36) Please provide the past seven years of Electro Magnetic Field (EMF) readings.
- 37) Do you plan on providing complete EMF studies to CSC and the neighborhood after the planned expansion? If so, when will these studies be done?

- 38) Has the existing substation ever operated at full capacity in past seven year? If so, how many times in the past seven years?
- 39) What is the average capacity that the substation operated at within the past 7 years?
- 40) What Capacity will the expanded substation operate at with present conditions?
- 41) What is UI's 7 year plan for this substation?
- 42) Who is UI contracted with to supply the mechanical parts (Capacitors) for the new addition to the substation?
- 43) Are there other manufacturers that can supply more environmentally friendly equipment for the substation?
- 44) Does any of the old or future equipment contain PCB Polychlorinated biphenyls (PCBs)/dielectric fluid?
- 45) What is the type of coolant used in the new capacitors?
- 46) Are you aware of any other property that has been purchased or given right of use to UI, for this project/expansion? If so please explain.
- 47) We have learning from an unidentified source that the only reason UI would have to expand the substation is if CL&P increases the capacity in the lines. It is our understanding that CL&P have no plans to do that. Can you please comment on this?
- 48) We understand that there is a well located on 160 Hawthorne Drive (Joseph and Jill Alemdia), James Hinckley of UI or GE, is listed as an authorized agent for the Almedias. Can you go into more detail about this arrangement?
- 49) Did UI publish a legal notice prior to the Petition being filed? If so in which publication and a date of insertion.
- 50) Did UI discuss this modification with any abutter prior to submitting the petition? If yes, please identify name and address.
- 51) What other options and/or other locations has UI considered to meet their future load capacity needs?

***Note: When UI's photo is mentioned it is referring to UI's Pre-filed hearing Testimony dated 12/05/15 referred to as "Photo –Simulation Image"***